

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
· MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, JOHN DOE, JANE DOE I, JANE
DOE 2, AND JANE DOE 3,

Plaintiffs,

v.

Civil Action No.: 3:17CV00072

JASON KESSLER, et al.

Defendants.

DEFENDANTS RULE 26(a) DISCLOSURES

NOW COME Defendants Christopher Cantwell, Nathan Damigo, Matthew Heimbach, Identity Europa, Jason Kessler, Elliot Kline, National Socialist Movement, Nationalist Front, Matthew Parrott, Jeff Schoep, Traditionalist Worker Party, Vanguard America, and Robert Ray, through Counsel, make the following disclosures.

A. Individuals Likely to Have Discoverable Information:

Upon information and belief, all Plaintiffs and Defendants have information as to the allegations in the Complaint and any Answers as to whether the facts alleged are true. In addition to the parties, Defendants identify the following individuals:

- I. Detective Steven Young
Charlottesville Police Department
606 E. Market St.
Charlottesville, Virginia 22902
434.970.3280

Summary: According to news articles, Detective Young participated in the apprehension and questioning of Fields. Upon information and belief, Detective Young has information about the absence of documentation that Fields was a member of any white nationalist group on searches of Fields' phone, computer and social media and has information as to his countenance and statements following his arrest.

2. Chief Al Thomas
Charlottesville Police Department
606 E. Market St.
Charlottesville, Virginia 22902
434.970.3280

Summary: Chief Al Thomas was the Chief of Police for the City of Charlottesville during the time of all allegations in the Complaint. Upon information and belief, Chief Thomas has information as to the security plans, pedestrian routes and road closures intended by the City of Charlottesville and his department in preparation for the rally and whether those plans were followed.

3. Lieutenant Joe Hatter
Charlottesville Police Department
606 E. Market St.
Charlottesville, Virginia 22902
434.970.3280

Summary: Lieutenant Hatter was the supervisor of the investigations unit and recommended additional options such as a wrought-iron fence and officers on horseback for crowd control.

4. Captain Victor Mitchell
Charlottesville Police Department

606 E. Market St.
Charlottesville, Virginia 22902
434.970.3280

Summary: Captain Mitchell was designated by Chief Thomas as the incident commander and assisted in the design of the CPD operation plan for the rally. Upon information and belief, Captain Mitchell has information as to the security plans, pedestrian routes and road closures intended by the City of Charlottesville and his department in preparation for the rally and whether those plans were followed.

5. Lieutenant Steve Knick
Charlottesville Police Department
606 E. Market St.
Charlottesville, Virginia 22902
434.970.3280

Summary: Upon information and belief, Lieutenant Knick has information as to the security plans, pedestrian routes and road closures intended by the City of Charlottesville and his department in preparation for the rally and whether those plans and recommendations were followed.

6. Lieutenant Tito Durette
Charlottesville Police Department
606 E. Market St.
Charlottesville, Virginia 22902
434.970.3280

Summary: Upon information and belief, Lieutenant Durette has information as to the security plans, pedestrian routes and road closures intended by the City of Charlottesville and his department in preparation for the rally and whether those plans and recommendations were followed.

7. Sergeant Tony Newberry
Charlottesville Police Department
606 E. Market St.
Charlottesville, Virginia 22902
434.970.3280

Summary: Upon information and belief, Sergeant Newberry has information as to the security plans, pedestrian routes and road closures intended by the City of Charlottesville and his department in preparation for the rally and whether those plans and recommendations and plans were followed.

8. Chief Rick Lantz

Albemarle County Police Department
1600 5th St. NE
Charlottesville, Virginia 22902
434.296.5807

Summary: Upon information and belief, Chief Lantz has information as to the security plans and offers of assistance to Charlottesville PD and attempts, if any, by Charlottesville PD and Chief Thomas to obtain assistance from Albemarle County PD to control crowds and prevent violence at the rally.

9. Captain Sean Reeves
Albemarle County Police Department
1600 5th St. NE
Charlottesville, Virginia 22902
434.296.5807

Summary: Upon information and belief, Captain Reeves has information as to the security plans and offers of assistance to Charlottesville PD and attempts, if any, by Charlottesville PD and Chief Thomas to obtain assistance from Albemarle County PD to control crowds and prevent violence at the rally.

10. Timothy J. Heaphy, Esquire
Hunton & Williams
951 East Byrd Street
Richmond, VA 23219
804.788.8401

Summary: Mr. Heaphy conducted an external review of the City of Charlottesville's plan and coordination in advance of the rally and has information regarding the security plans, pedestrian routes and road closures in advance of the rally as well as the identity of additional potential witnesses.

11. Mr. Maurice Jones
Charlottesville City Manager
POBox911
Charlottesville, Virginia 22902

Summary: Mr. Jones received the initial permit application and participated in event preparation and planning.

12. Ms. Michelle Christian
Charlottesville Special Event Coordinator
POBox911

Charlottesville, Virginia 22902

Summary: Ms. Christian received the initial permit application and participated in event preparation and planning.

13. Ms. Miriam Dickler
Charlottesville Director of Communications
PO Box 911
Charlottesville, Virginia 22902

Summary: Ms. Dickler received the initial permit application and participated in event preparation and planning.

14. Mr. Brian Daly
Charlottesville Director of Parks and Recreation
PO Box 911
Charlottesville, Virginia 22902

Summary: Mr. Daly received the initial permit application and participated in event preparation and planning.

15. Mr. Paul Oberdorfer
Charlottesville Director of Public Works
PO Box 911
Charlottesville, Virginia 22902

Summary: Upon information and belief, Mr. Oberdorfer has information as to the security plans and road closures intended by the City of Charlottesville and his department in preparation for the rally and whether those plans and recommendations were followed.

16. Captain Wendy Lewis
Charlottesville Police Department
606 E. Market St.
Charlottesville, Virginia 22902
434.970.3280

Summary: Captain Lewis was the primary point of contact with organizer Jason Kessler and participated in event preparation and planning as well as pre-event research into expected actions and number of participants of potential attendees and known counter protesters.

17. Brittany Caine-Conley
Congregate Charlottesville

Charlottesville, Virginia

Summary: In concert with Mr. Wispelwey, Caine-Conley is believed to have organized counter protesters and provided training in tactics to delay and obstruct the rally for interested individuals potentially including members of Black Lives Matter (BLM) and Standing up for Racial Justice (SURJ).

18. W. Lawton Tufts, Esquire
Director of Public Service and Alumni Advising
580 Massie Road
Charlottesville, Virginia 22903
434.924.7354

Summary: Upon information and belief, Mr. Tufts participated in organizing and attempting to organize communications between BLM, Congregate Charlottesville Police Department and Congregate Charlottesville in advance of and preparation for the rally. Tufts advised membership of BLM and SURJ of warnings conveyed by law enforcement.

19. Anne Coughlin, Esquire
Professor of Law
580 Massie Road
Charlottesville, Virginia 22903
434.924.7354

Summary: Upon information and belief, Ms. Coughlin participated in organizing and attempting to organize communications between BLM, Congregate Charlottesville Police Department and Congregate Charlottesville in advance of and preparation for the rally and may have attended the rally.

20. Mayor Michael Signer, Esquire
Charlottesville City Hall
POBox911
Charlottesville, Virginia 22902

Summary: Mayor Signer reviewed the permit applications and participated in event preparation and planning for the rally. Upon information and belief, he further participated in personnel, security and law enforcement decision making as well as consideration of moving the rally to a different location.

21. Captain Craig Worsham
Virginia State Police
240 Third Division Loop
Appomattox, Virginia 24522

Summary: Upon information and belief, Captain Worsham was in charge of coordinating the Virginia State Troopers assigned to police the rally as well as staffing and planning VSP response.

22. Fire Chief Andrew Baxter
Charlottesville Fire Department
203 Ridge Street
Charlottesville, Virginia 22902
434.970.3240

Summary: Fire Chief Baxter has information regarding the emergency services plan for the rally by the Charlottesville Fire Department and the decision to request an "Incident Management Team from the Virginia Department of Emergency management. Upon information and belief, he may also have information regarding revisions to the plans as per input from VDEM.

23. Deputy Fire Chief Mike Rogers
Charlottesville Fire Department
203 Ridge Street
Charlottesville, Virginia 22902
434.970.3240

Summary: Deputy Fire Chief Rogers has information regarding the emergency services plan for the rally by the Charlottesville Fire Department.

24. Deputy Fire Chief Emily Pelliccia
Charlottesville Fire Department
203 Ridge Street
Charlottesville, Virginia 22902
434.970.3240

Summary: Deputy Fire Chief Pelliccia has information regarding the emergency services plan for the rally by the Charlottesville Fire Department and the coordination with the Virginia Department of Emergency Management.

25. Emily Gorcenski
"Charlottesville Activist"
Address unknown

Summary: Emily Gorcenski reportedly has information regarding events and information shared leading up to the march and rally and is believed to have been present at both the march and the rally.

26. Chief Michael Gibson
University of Virginia Police
2304 Ivy Road
Charlottesville, Virginia
434.924.7166

Summary: Chief Gibson may have information regarding notice to the University and planning of the "torch march" referenced in the Complaint.

27. Diane Hueschen, civilian employee
Charlottesville Police Department
606 E. Market St.
Charlottesville, Virginia 22902
434.970.3280

Summary: Hueschen is believed to have been the lone officer blocking vehicle access to 2nd Street NE and High Street.

28. Tammy Shiflett, school resource officer
Charlottesville Police Department
606 E. Market St.
Charlottesville, Virginia 22902
434.970.3280

Summary: Shiflett is believed to be the lone officer blocking vehicle access at 4th Street and NE Market Street. She is further believed to have communicated with Captain Lewis regarding the movement of the crowd in her direction. Upon information and belief, she was instructed to move her car out of the intersection leaving the intersection blocked by only a wooden sawhorse while the crowd of counter-protesters was pushed toward this area by law enforcement.

29. Any party to case #
2017 CV00078

Summary: Said individuals are parties to litigation covering the same incident as this lawsuit.

30. Ms. Samantha Bloom
Mother of James Fields
Maumee, Ohio

Summary: Ms. Bloom may have information as to her son's plans to attend the rally in Virginia.

B. Documents, Data, Compilation and Tangible Things

Fields is in possession of the following documents, data compilation or tangible things all of which are available on the internet.

- I. News media incident reports and descriptions of the incidents sued upon from various newspapers and websites including but not limited to:
 - a. Richmond Times Dispatch
 - b. Washington Post
 - c. Daily Progress
 - d. The Guardian
 - e. New York Times
 - f. Vox.com
 - g. Time Magazine
- II. Numerous open source videos are available on Youtube as well as media websites such as CNN purporting to show cell phone video of the rally as well as the car accident.
- III. "Independent Review of the 2017 Protest Events In Charlottesville, Virginia" authored by Timothy J. Heaphy, Esq. Hunton & Williams, LLP dated 11.24.17.

C. Insurance Agreement That Might Be Applicable to James Alex Fields, Jr.

None known to disclosing defendants.

Respectfully Submitted,

s/ Elmer Woodard
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s/ James E. Kolenich (PHV)

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CERTIFICATE OF SERVICE

I hereby certify this Notice and all accompanying documents were served via electronic mail on November 20, 2017 upon:

All parties of record. No party is entitled to or has requested service by other means except as listed below

Michael Peinovich, Defendant *prose*
519 E. 82nd Street, Apt. 2C New York, NY 10028

Richard Spencer
1001-A King Street Alexandria, Virginia 22314

Loyal White Knights of the Ku Klux Klan
c/o Chris and Amanda Baker
PO Box 54
Pelham, NC 27311

s/ Elmer Woodard
E. Woodard (VSB 27734)